

THE MARKS LAW FIRM, P.C.

April 23, 2020

Via ECF

Honorable Mary Kay Vyskocil
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/24/2020

RE: Eric Rogers v. Burrito Y Mas, Corp et al.
Docket: 1:19-cv-10333-MKV

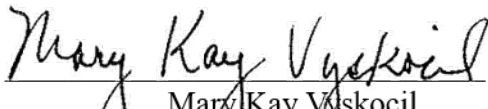
Dear Judge Vyskocil,

In accordance with your Honor's order, Plaintiff respectfully provides this status report and requests a temporary stay in the above referenced matter. As of today, Defendants have not yet contacted Plaintiff, appeared, answered or otherwise moved. Plaintiff intends to move for default. Due to the ongoing health crisis caused by the COVID-19 pandemic, and the tumultuous economic effects it is causing to virtually all businesses open to the public (including possible complete closures), such as the business involved in this matter, Plaintiff is unable to determine at this time whether the Defendant's business is closed and non-responsive due to a temporary or more permanent closing. Therefore, Plaintiff's undersigned counsel hereby respectfully requests that the Court grant a sixty (60) day stay of all deadlines including the deadlines to move for default. This is the undersigned counsel's first request to stay this matter.

Thank you for your consideration of this unexpected, but essential, request.

There is no deadline to move for a default judgment. However, in light of the Plaintiff's representations here, the Court will not expect any filings in anticipation of a motion for default judgment until mid-June. In the event no motion is filed, the Plaintiff should further update the Court via letter on or before June 26, 2020.

Date: 4/24/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully Submitted,

The Marks Law Firm, P.C.

By:


Bradly G. Marks